

## EXHIBIT 103

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE NORTHERN DISTRICT OF OHIO  
3           EASTERN DIVISION  
4                   -   -   -  
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6           IN RE:    NATIONAL                         :   HON. DAN A.  
7           PRESCRIPTION OPIATE                    :   POLSTER  
8           LITIGATION                               :     
9                                                       :     
10          APPLIES TO ALL CASES                   :   NO.  
11                                                       :   1:17-MD-2804  
12                                                       :     
13                                                       :   

14                               - HIGHLY CONFIDENTIAL -  
15

16          SUBJECT TO FURTHER CONFIDENTIALITY REVIEW  
17  
18                               -   -   -  
19

20                               March 15, 2019  
21                               -   -   -  
22

23                               Videotaped deposition of  
24          STEPHEN C. MACRIDES taken pursuant to  
notice, was held at the offices of  
McCarter & English, LLP, 1600 Market  
Street, Philadelphia, Pennsylvania,  
beginning at 9:05 a.m., on the above  
date, before Michelle L. Gray, a  
Registered Professional Reporter,  
Certified Shorthand Reporter, Certified  
Realtime Reporter, and Notary Public.

25                               -   -   -  
26                               GOLKOW LITIGATION SERVICES  
27                               877.370.3377 ph | 917.591.5672 fax  
28                               deps@golkow.com  
29

<p style="text-align: right;">Page 50</p> <p>1 the years that Endo, Qualitest and Par's 2 products were abused and diverted, 3 correct?</p> <p>4 MS. VANNI: Objection.</p> <p>5 THE WITNESS: I don't know 6 to what degree Endo and Qualitest 7 products were diverted.</p> <p>8 BY MR. BUCHANAN:</p> <p>9 Q. I didn't ask you to what 10 degree. We can agree that Endo and 11 Qualitest opioid products were abused and 12 diverted, correct, sir?</p> <p>13 MS. VANNI: Objection.</p> <p>14 THE WITNESS: We can agree 15 that if these products are not 16 properly controlled, they can be 17 diverted and abused.</p> <p>18 BY MR. BUCHANAN:</p> <p>19 Q. That's not my question. 20 Sitting here today, as the 21 corporate representative for Par, Endo 22 and Qualitest, is it your testimony, sir, 23 that no -- and we're looking at hundreds 24 of millions of pills and dosage units for</p>	<p style="text-align: right;">Page 52</p> <p>1 Objection. Misstates his 2 testimony.</p> <p>3 Go ahead. Give me a second 4 to object.</p> <p>5 THE WITNESS: I -- sorry.</p> <p>6 MS. VANNI: It's okay.</p> <p>7 BY MR. BUCHANAN:</p> <p>8 Q. You can answer.</p> <p>9 MS. VANNI: You can answer.</p> <p>10 THE WITNESS: I'm testifying 11 that these products, if not 12 properly controlled, can be abused 13 or diverted.</p> <p>14 BY MR. BUCHANAN:</p> <p>15 Q. I'm just trying to get an 16 answer, sir, to a very, I think, simple 17 question.</p> <p>18 Is it the testimony of Endo, 19 Par and Qualitest corporate designee that 20 Endo, Qualitest, and Par's opioid 21 products were not abused or diverted?</p> <p>22 MS. VANNI: Objection.</p> <p>23 BY MR. BUCHANAN:</p> <p>24 Q. Is that your testimony, sir?</p>
<p style="text-align: right;">Page 51</p> <p>1 each year, that none of the Endo opioids, 2 of the Par opioids, of the Qualitest 3 opioids, were abused or diverted, is that 4 your testimony, sir?</p> <p>5 MS. VANNI: Objection.</p> <p>6 THE WITNESS: I can't -- I 7 cannot speak to the degree to 8 which Endo or Qualitest opioid 9 products may or may not have been 10 abused.</p> <p>11 What I can testify to is 12 that if these products are not 13 properly controlled, they -- they 14 can be abused and diverted.</p> <p>15 BY MR. BUCHANAN:</p> <p>16 Q. Right. And again, you keep 17 coming back to the degree, which I guess 18 does answer my question, sir.</p> <p>19 Because you do agree that 20 Endo, Qualitest and Par products were 21 abused and diverted?</p> <p>22 A. I agree that these 23 products --</p> <p>24 MS. VANNI: Objection.</p>	<p style="text-align: right;">Page 53</p> <p>1 MS. VANNI: Objection. 2 Asked and answered.</p> <p>3 THE WITNESS: My testimony 4 is that if these products are not 5 properly controlled, they can be 6 abused or diverted.</p> <p>7 BY MR. BUCHANAN:</p> <p>8 Q. Okay. I don't think we're 9 communicating, are we?</p> <p>10 MS. VANNI: Objection to 11 colloquy.</p> <p>12 BY MR. BUCHANAN:</p> <p>13 Q. This feels like a Sunday 14 morning talk show five minutes in.</p> <p>15 Are you having a problem 16 understanding my question?</p> <p>17 MS. VANNI: Objection.</p> <p>18 THE WITNESS: I don't -- 19 I -- I'm not having a problem 20 understanding your question.</p> <p>21 BY MR. BUCHANAN:</p> <p>22 Q. Okay. So my question, sir, 23 and just as a -- it will really help us, 24 I think, throughout the day, if I</p>

<p style="text-align: right;">Page 54</p> <p>1 understand really the point of view of 2 the company with regard to whether or not 3 its drugs have been -- have been abused 4 or diverted. 5 MS. VANNI: Objection. 6 Asked and answered. 7 BY MR. BUCHANAN: 8 Q. Is it the companies' 9 understanding that its drugs have not 10 been abused or diverted? 11 MS. VANNI: Objection. 12 THE WITNESS: I'm saying 13 that it's the companies' 14 understanding that if its products 15 are not properly controlled and 16 kept within a closed system, that 17 they can be abused or diverted. 18 That's how I'm answering the 19 question. 20 BY MR. BUCHANAN: 21 Q. I -- I understand that, as 22 a -- as a speaker of the English 23 language, do you understand my question? 24 MS. VANNI: Objection to</p>	<p style="text-align: right;">Page 56</p> <p>1 Q. Would that surprise you? 2 A. As I stated, if our products 3 are not properly controlled, they can be 4 diverted. 5 Q. I'm asking you whether you'd 6 be surprised to learn that your products 7 were abused and diverted? 8 MS. VANNI: Object to form. 9 THE WITNESS: I would be 10 surprised in the context that we 11 have proper controls in place to 12 prevent abuse and diversion. 13 BY MR. BUCHANAN: 14 Q. I -- what does that mean? 15 I'm just asking you as a fact. 16 As a fact, would it be 17 surprising to you, sir, that drugs were 18 not used for legitimate medical need 19 pursuant to proper prescription, would 20 that surprise you? 21 MS. VANNI: Object to form. 22 THE WITNESS: I understand 23 that there is an opioid abuse 24 epidemic in this country.</p>
<p style="text-align: right;">Page 55</p> <p>1 form. Argumentative. 2 BY MR. BUCHANAN: 3 Q. Do you understand what I'm 4 asking? 5 A. I understand what you're 6 asking. 7 Q. And you're electing not to 8 answer it? 9 A. You're asking me if I have 10 specific knowledge that our products have 11 been abused, and I'm telling you that I 12 do not. 13 Q. No, no. 14 A. What I -- what I'm telling 15 you is that I have an understanding that 16 if our products are not properly 17 controlled, they can be abused or 18 diverted. 19 Q. Would it surprise you to 20 learn, sir, that, in fact, Endo's, 21 Qualitest's, and Par's products were 22 indeed abused and diverted? 23 MS. VANNI: Object to form. 24 BY MR. BUCHANAN:</p>	<p style="text-align: right;">Page 57</p> <p>1 BY MR. BUCHANAN: 2 Q. Okay. 3 A. And I understand that opioid 4 products are making their way out of the 5 closed system and are subject to abuse 6 and diversion. Yes, I understand that. 7 Q. Okay. Okay. So we can 8 agree on a few things then. 9 There's an opioid epidemic. 10 MS. VANNI: Object to form. 11 THE WITNESS: Opioid abuse 12 epidemic. 13 BY MR. BUCHANAN: 14 Q. Okay. So, meaning opioids 15 are being abused that were made for 16 medical purposes, but are, in fact, being 17 abused and used in illicit ways, fair? 18 A. I understand that there is 19 abuse of opioids. 20 Q. You are, you, speaking for 21 the company, are a very large 22 manufacturer and distributor of opioid 23 products, correct? 24 MS. VANNI: Object to form.</p>

<p style="text-align: right;">Page 58</p> <p>1 THE WITNESS: We are a</p> <p>2 manufacturer and distributor of</p> <p>3 opioid products.</p> <p>4 BY MR. BUCHANAN:</p> <p>5 Q. Okay. Looking at our chart</p> <p>6 here, we see billions and billions and</p> <p>7 billions of pills for one of the three</p> <p>8 entities that were made over the years of</p> <p>9 opioid products, correct?</p> <p>10 MS. VANNI: Objection. Also</p> <p>11 objection to the use of this</p> <p>12 demonstrative with this witness.</p> <p>13 You're asking him to authenticate</p> <p>14 your demonstrative. I think it's</p> <p>15 an improper use.</p> <p>16 MR. BUCHANAN: Well, that's</p> <p>17 interesting, because we've asked</p> <p>18 you to authenticate things and you</p> <p>19 just consistently refuse to do so.</p> <p>20 So I do have a corporate rep</p> <p>21 who is here so...</p> <p>22 BY MR. BUCHANAN:</p> <p>23 Q. So are you aware of anything</p> <p>24 that's wrong with this chart, sir?</p>	<p style="text-align: right;">Page 60</p> <p>1 want me to?</p> <p>2 Q. I was referring to 1999 to</p> <p>3 orient you.</p> <p>4 A. 1999, 357 million.</p> <p>5 Q. And we can go forward to</p> <p>6 2000 and we see, I guess, business has</p> <p>7 grown, right?</p> <p>8 MS. VANNI: Object to form.</p> <p>9 THE WITNESS: We see --</p> <p>10 BY MR. BUCHANAN:</p> <p>11 Q. Did you see more or less in</p> <p>12 2000?</p> <p>13 A. We see 545 million in -- I'm</p> <p>14 sorry, 2000?</p> <p>15 Q. 2000, what do you see?</p> <p>16 A. 452 million.</p> <p>17 Q. Yeah. And my question was,</p> <p>18 was it growing over 1999?</p> <p>19 MS. VANNI: Object to form.</p> <p>20 THE WITNESS: 2000 is a</p> <p>21 higher number than 1999.</p> <p>22 BY MR. BUCHANAN:</p> <p>23 Q. That would mean it's</p> <p>24 growing?</p>
<p style="text-align: right;">Page 59</p> <p>1 A. What I see with this chart</p> <p>2 is an average of about 440 million</p> <p>3 tablets per year being distributed.</p> <p>4 Q. Consistent with your</p> <p>5 knowledge and understanding of Endo's</p> <p>6 production of opioids over the years,</p> <p>7 sir?</p> <p>8 A. It is.</p> <p>9 Q. Okay. So we see all the way</p> <p>10 back in 1999 hundreds of millions of</p> <p>11 opioid pills being made by Endo and</p> <p>12 entering the market, correct?</p> <p>13 MS. VANNI: Object to form.</p> <p>14 THE WITNESS: We see pills</p> <p>15 being distributed to customer to</p> <p>16 be distributed to patients who</p> <p>17 need them.</p> <p>18 BY MR. BUCHANAN:</p> <p>19 Q. Mm-hmm. And answering my</p> <p>20 question: Hundreds of millions of pills,</p> <p>21 correct?</p> <p>22 A. Is there a specific --</p> <p>23 Q. Back in 19 --</p> <p>24 A. Is there a specific year you</p>	<p style="text-align: right;">Page 61</p> <p>1 A. There's growth.</p> <p>2 Q. Okay. And let's see, how</p> <p>3 did we do from 2000 to 2001, sir?</p> <p>4 Doing better?</p> <p>5 MS. VANNI: Object to form.</p> <p>6 BY MR. BUCHANAN:</p> <p>7 Q. Selling more?</p> <p>8 MS. VANNI: Objection.</p> <p>9 THE WITNESS: We're shipping</p> <p>10 more product to patients who need</p> <p>11 them.</p> <p>12 BY MR. BUCHANAN:</p> <p>13 Q. Okay. 500 plus million,</p> <p>14 half a billion pills; is that right?</p> <p>15 A. 516 million.</p> <p>16 Q. Okay.</p> <p>17 MS. VANNI: Also note my</p> <p>18 objection that he is not a</p> <p>19 30(b)(6) on sales history.</p> <p>20 BY MR. BUCHANAN:</p> <p>21 Q. Okay. I believe, in fact,</p> <p>22 you are a designee on suspicious order</p> <p>23 monitoring, correct?</p> <p>24 A. Correct.</p>

<p style="text-align: right;">Page 62</p> <p>1 Q. Okay. Each of the shipments 2 that are memorialized in shipping records 3 followed an order, right? 4 MS. VANNI: Object to form. 5 THE WITNESS: You need an 6 order to ship a product. 7 BY MR. BUCHANAN: 8 Q. Understood. Since the 9 beginning of Endo's existence, Endo has 10 been charged with maintain -- maintaining 11 effective controls against diversion, 12 correct? 13 MS. VANNI: Object to form. 14 THE WITNESS: The 15 regulations state that we need to 16 have controls to prevent 17 diversion. 18 BY MR. BUCHANAN: 19 Q. Not just any controls, 20 right? 21 A. Can you clarify what you 22 mean by that? 23 Q. You have to have effective 24 controls, right?</p>	<p style="text-align: right;">Page 64</p> <p>1 abide by the regulations and make sure we 2 have effective controls in place to 3 prevent the abuse and diversion of our 4 products, and that's what we've done. 5 Q. As a human being or a 6 company that's supposed to be acting like 7 a human being, you have an obligation to 8 keep this stuff in its channel, right? 9 MS. VANNI: Object to form. 10 THE WITNESS: I don't know 11 what you mean by acting like a 12 human being. That's very vague. 13 What I can tell you is that 14 we have a responsibility to abide 15 by the regulations that are in 16 place to prevent the abuse and 17 diversion of our products. 18 BY MR. BUCHANAN: 19 Q. Is there any doubt in your 20 mind, sir, that this stuff is dangerous? 21 MS. VANNI: Object to form. 22 THE WITNESS: These 23 products, if not properly 24 controlled and kept within the</p>
<p style="text-align: right;">Page 63</p> <p>1 A. Yes. We have to have 2 controls in place to prevent diversion. 3 Q. You have to have -- what's 4 the word you dropped? 5 MS. VANNI: Object to form. 6 BY MR. BUCHANAN: 7 Q. Effective controls, right? 8 A. That those controls should 9 be effective. 10 Q. That's right. 11 A. I don't disagree with you. 12 Q. Okay. So from the 13 beginning, from 1999 till today, Endo has 14 been responsible for ensuring it has 15 effective controls to prevent diversion, 16 correct? 17 A. By the regulations, that's 18 what we need to do. 19 Q. As a reasonable company, 20 that's what you need to do -- 21 MS. VANNI: Object to form. 22 BY MR. BUCHANAN: 23 Q. -- right? 24 A. We have a responsibility to</p>	<p style="text-align: right;">Page 65</p> <p>1 controlled system, can be abused 2 and diverted and in that context 3 could be dangerous. 4 BY MR. BUCHANAN: 5 Q. Dangerous how? 6 MS. VANNI: Object to form. 7 THE WITNESS: I understand 8 they can lead to addiction which 9 can lead to other problems. 10 BY MR. BUCHANAN: 11 Q. Like what? 12 MS. VANNI: Objection. It's 13 beyond the scope of his 30(b)(6). 14 THE WITNESS: It can lead to 15 all kinds of problems. I'm not a 16 doctor, so I can't necessarily 17 speak to the specifics of that. 18 BY MR. BUCHANAN: 19 Q. As a -- as an executive in a 20 pharmaceutical company making opioids in 21 2019, what are some of those dangers, 22 sir? 23 MS. VANNI: Object to form. 24 THE WITNESS: Opioid</p>